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December 7, 1992

RECEIVED

DEC - 7 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, DC 20554

Re: **Petition for Rule Making**
FM Table of Allotments
Channel 247C2, Starbuck, MN

Dear Ms. Searcy:

Transmitted herewith on behalf of Starbuck Broadcasters are an original and six (6) copies of its Petition for Rule Making to request a rule making proceeding to allot FM Channel 247C2 to Starbuck, Minnesota. Kindly refer this information to the Chief, Allocations Branch.

Should you or the staff have any questions regarding this matter, kindly contact the undersigned.

Sincerely,


Gregg P. Skall
Counsel for
Starbuck Broadcasters

Enclosures

No. of Copies rec'd ATC
List A B C D E MM

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Amendment of Section 73.202(b)) RM -
Table of Allotments)
FM Broadcast Stations)
(Starbuck, Minnesota))

TO: The Chief, Allocations Branch

RECEIVED
DEC - 7 1992
FEDERAL COMMUNICATIONS
COMMISSION
WASHINGTON, DC 20554
OFFICE OF THE SECRETARY

PETITION FOR RULEMAKING

Starbuck Broadcasters, by its attorneys and pursuant to Section 1.401(a) and Section 1.420 of the Rules of the Commission, hereby request the institution of a rule making proceeding to allot FM Channel 247C2 to Starbuck, Minnesota. In support thereof, the following is shown:

1. Starbuck, Minnesota is an incorporated city in Pope County, Minnesota. The city has a 1990 population of 1,143. There is currently no local aural service licensed to Starbuck.


2. Starbuck Broadcasters submits herewith an engineering statement and exhibit setting forth technical parameters of its proposal. As shown on the attached engineering report of Owl Engineering, Inc., the allotment of Channel 247C2 at Starbuck, Minnesota, will meet the Commission's minimum distance separation requirements of Section 73.207 of the Commission's Rules, with a site restriction 12 km to the southeast of Starbuck.

3. Starbuck Broadcasters has a present intention to file an application for the new Starbuck, Minnesota channel when allotted, and when authorized, to build the station promptly.

For the foregoing reasons, Starbuck Broadcasters respectfully requests that the Commission institute a rule making proceeding to allot Channel 247C2 at Starbuck, Minnesota.

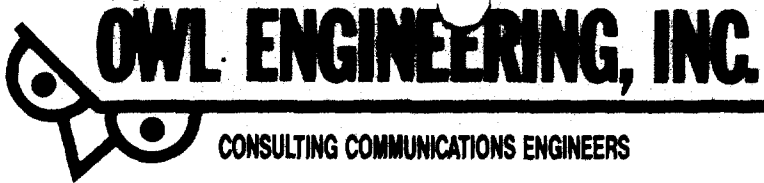
Respectfully submitted,

STARBUCK BROADCASTERS

By: 
Gregg A. Skall
Its Attorney

Pepper & Corazzini
1776 K Street, N.W., Suite 200
Washington, DC 20006
(202) 296-0600

December 7, 1992



CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING STATEMENT
ON BEHALF OF STARBUCK BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 247 TO STARBUCK, MINNESOTA**

December 2, 1992

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CHANNEL 247 TO STARBUCK, MINNESOTA**

Owl Engineering, Inc. has been retained by STARBUCK BROADCASTERS (hereafter "Starbuck") to prepare this Engineering Statement in support of a petition to amend the FM Table of Allotments, FCC Rules Section 73.202(b) as follows:

Location
Starbuck, MN

Present

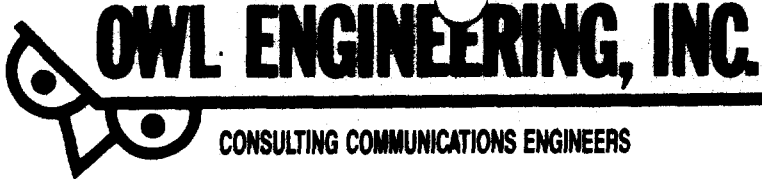
Proposed
247C2

The reference coordinates used for this study are:

45 32' 00" North Latitude
95 25' 15" West Longitude

"Starbuck"'s proposal will provide Starbuck, Minnesota with first aural regional service.

The proposed site will provide 60 dBu (1 mV/m) signal coverage to the population encompassed by an area of approximately 8,540 square kilometers. Starbuck has a population of 1,143 based on 1990 U.S. Census data.



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THE FM TABLE OF ALLOTMENTS
CHANNEL 247 TO STARBUCK, MINNESOTA**

The proposal of "Starbuck" was evaluated to determine if the proposed coordinates would meet FCC spacing requirements. That analysis is attached as Engineering Exhibit E-1. As can be seen from exhibit E-1, "Starbuck"'s proposal meets all FCC spacing requirements set forth in section 73.207 of the FCC Rules with a site restriction 12 kilometers to the Southeast of Starbuck. Three stations limit the available area for locating a transmitter for channel 247 at Starbuck. The protection arcs for radio stations KTCZ, Minneapolis, KDKK, Park Rapids and KPAT, Sioux Falls were plotted and are shown in Engineering Exhibit E-2. There would be approximately 390 square kilometers (150 square miles) to select a suitable transmitter site to meet FCC spacing and city coverage requirements. This area was determined by a calibrated polar planimeter.

The proposal of "Starbuck" was evaluated to determine if the proposed site would meet FCC signal coverage requirements. The distance from the reference coordinates to the center city coordinates of Starbuck is 12.4 kilometers at a bearing of 316.5 degrees. The three to sixteen kilometer average terrain was computed using the NGDC data base and the distance to contours was computed using the FCC F(50,50) metric curves. The distance to the 70 dBu contour along the radial through the principle city was calculated to be 33.7 kilometers, surpassing the city by some 21 kilometers. Engineering Exhibit E-3 shows the 70 dBu signal contour plotted and demonstrates that all of Starbuck is encompassed by the 70 dBu contour. In addition to the FCC predicted 70 dBu contour covering Starbuck, a detailed



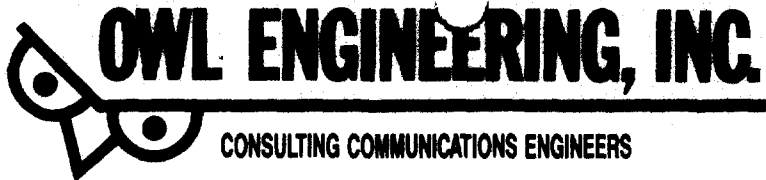
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CHANNEL 247 TO STARBUCK, MINNESOTA**

terrain study was performed utilizing the Defense Mapping Agency's digitized terrain database containing terrain elevations for every 3-arc seconds of latitude and longitude. The terrain elevations from the proposed tower site to the most distant edge of Starbuck was retrieved and plotted versus antenna height. Engineering Exhibit E-4 shows the results of the plot. As can be seen from this exhibit there are no major obstacles in the path to the principle community. Clearly, the proposal of "Starbuck" meets the requirements of FCC Rules section 73.315(a).

The proposal of "Starbuck" was evaluated to determine the population served by the 60 dBu signal contour based on 1990 US census data. The distance to the 60 dBu signal contour was calculated with the procedure referenced above. The population count was made through the employment of a computer program containing a data base including the geographic coordinates of the centroids of population groupings. It was determined that 82,372 persons would be served by a signal strength of 60 dBu or greater from the proposed site with maximized Class C2 facilities.



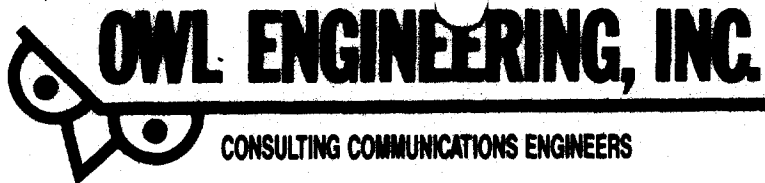
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THE FM TABLE OF ALLOTMENTS
CHANNEL 247 TO STARBUCK, MINNESOTA**

Based on the engineering studies provided, the following conclusions can be obtained:

1. The proposal will provide Starbuck with a full time regional broadcast service.
2. The proposal will meet the requirements of FCC Rules Section 73.315.
3. The proposal will meet the requirements of FCC Rules Section 73.207.
4. The proposal will provide Starbuck with first aural service.
5. The proposal will provide 82,372 persons in 8,540 square kilometers with 60 dBu or greater signal strength.



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THE FM TABLE OF ALLOTMENTS
CHANNEL 247 TO STARBUCK, MINNESOTA**

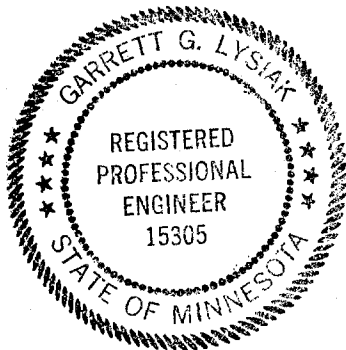
AFFIDAVIT

RAMSEY COUNTY)

STATE OF MINNESOTA)

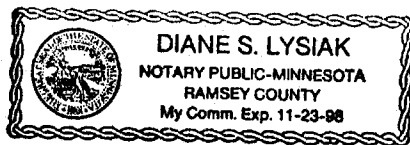
ss:

Garrett G. Lysiak, being first duly sworn, says that he is president of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota; that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission; that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



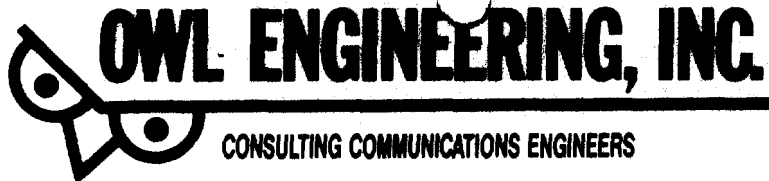
Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date December 2, 1992



Diane S. Lysiak
Notary Public

My commission expires November 23, 1998



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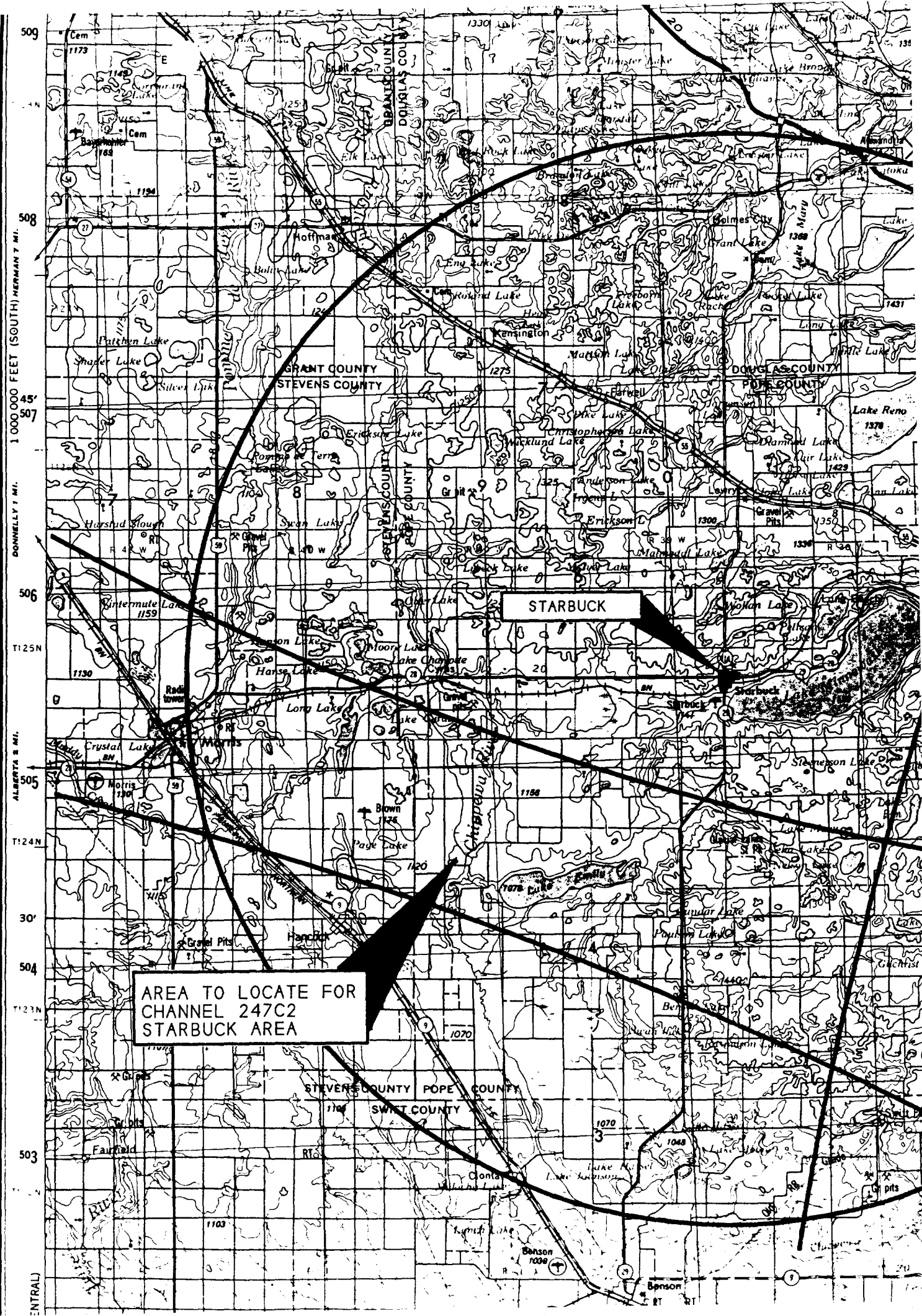
**ENGINEERING EXHIBIT E-1
STARBUCK BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 247 TO STARBUCK, MINNESOTA**

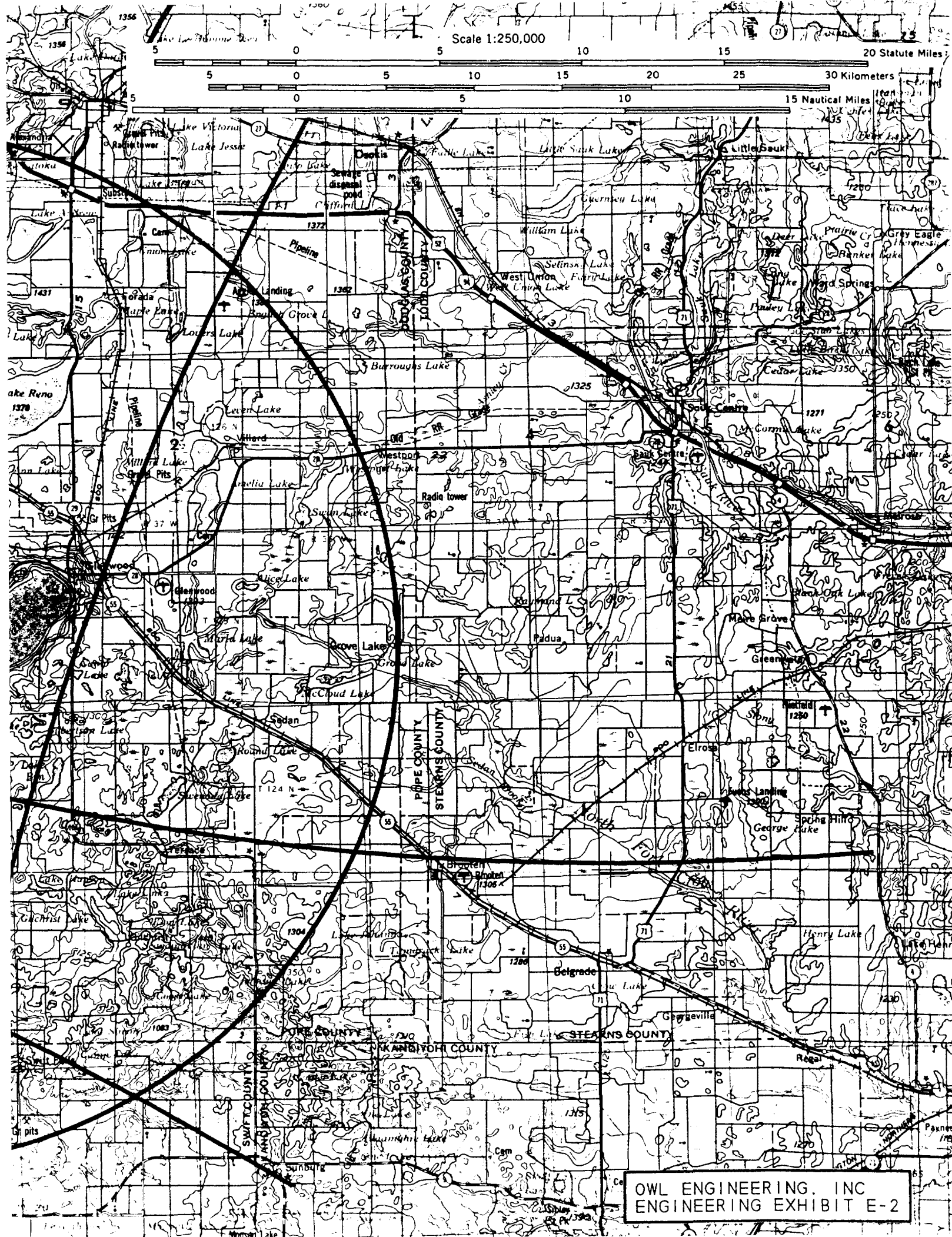
FM Channel 247-C2

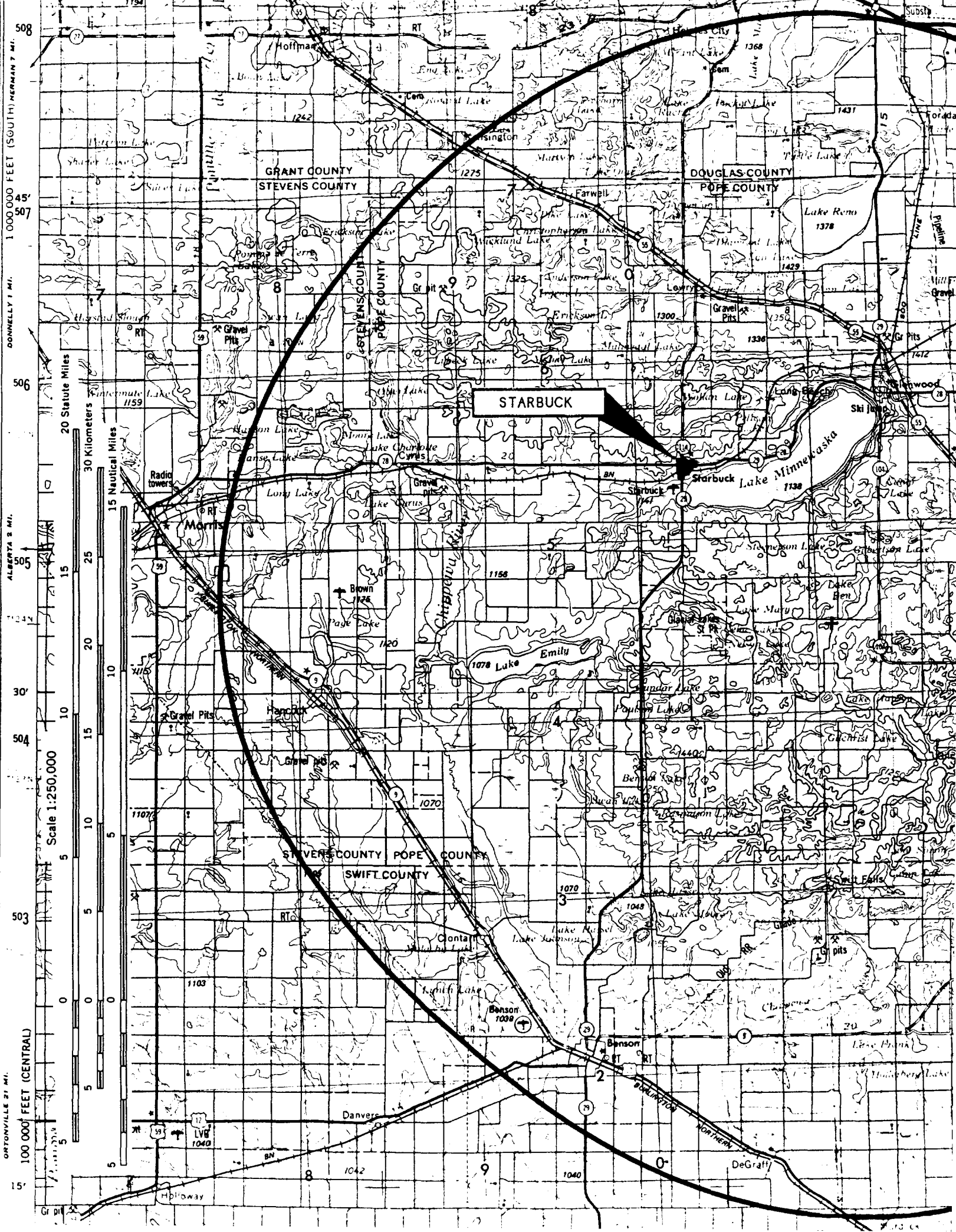
LATITUDE: 45° 32' 0"
LONGITUDE: 95° 25' 15"

| CHNL | Call | City | Class | Calculated Km. | Required Km. | Clear- ance | Bearing ° |
|------|-------------|--------------------|-------|-------------------|-----------------|----------------|--------------|
| 300 | NO CONFLICT | | | | | | |
| 244 | KKSR | FMMN Sartell | C2 | 103.60 | 58 | 45.60 | 74.94 |
| 244 | | FAMN Sartell | C2 | 108.46 | 58 | 50.46 | 76.86 |
| 245 | NO CONFLICT | | | | | | |
| 246 | KTCZFM | FMMN Minneapolis | C | 187.73 | 188 | -0.27 | 105.57 |
| 246 | | FAMN Minneapolis | C | 169.66 | 188 | -18.34 | 108.84* |
| 247 | | FASD Sioux Falls | C1 | 235.96 | 224 | 11.96 | 204.57 |
| 247 | KPAT | FMSD Sioux Falls | C1 | 235.96 | 224 | 11.96 | 204.57 |
| 248 | | FAMN Park Rapids | C1 | 158.33 | 158 | 0.33 | 11.47 |
| 248 | KDKK | FMMN Park Rapids | C1 | 158.33 | 158 | 0.33 | 11.47 |
| 248 | KDKK | FMMN Park Rapids | C1 | 158.33 | 158 | 0.33 | 11.47 |
| 249 | KLGRFM | FMMN Redwood Falls | C1 | 112.37 | 79 | 33.37 | 168.27 |
| 249 | | FAMN Redwood Falls | C1 | 112.43 | 79 | 33.43 | 168.28 |
| 250 | NO CONFLICT | | | | | | |

* The allocation record for channel 246 at Minneapolis, MN does not require protection since radio station KTCZ is presently licensed for channel 246.







STARBUCK

Starbuck

Ski jump

Lake Millelaska

1738

Gravel pits

Gravel pits

Gravel pits

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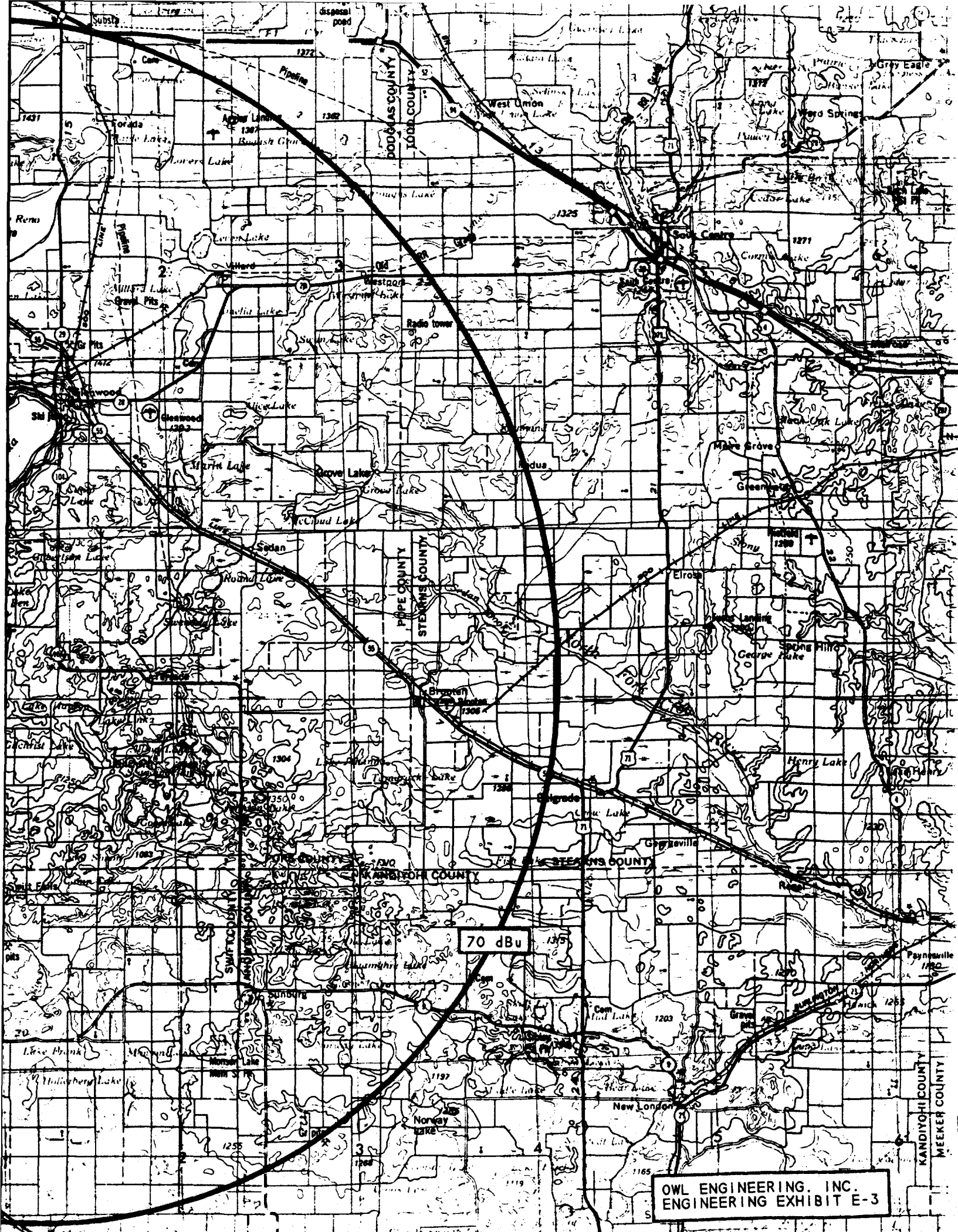
Gravel pits

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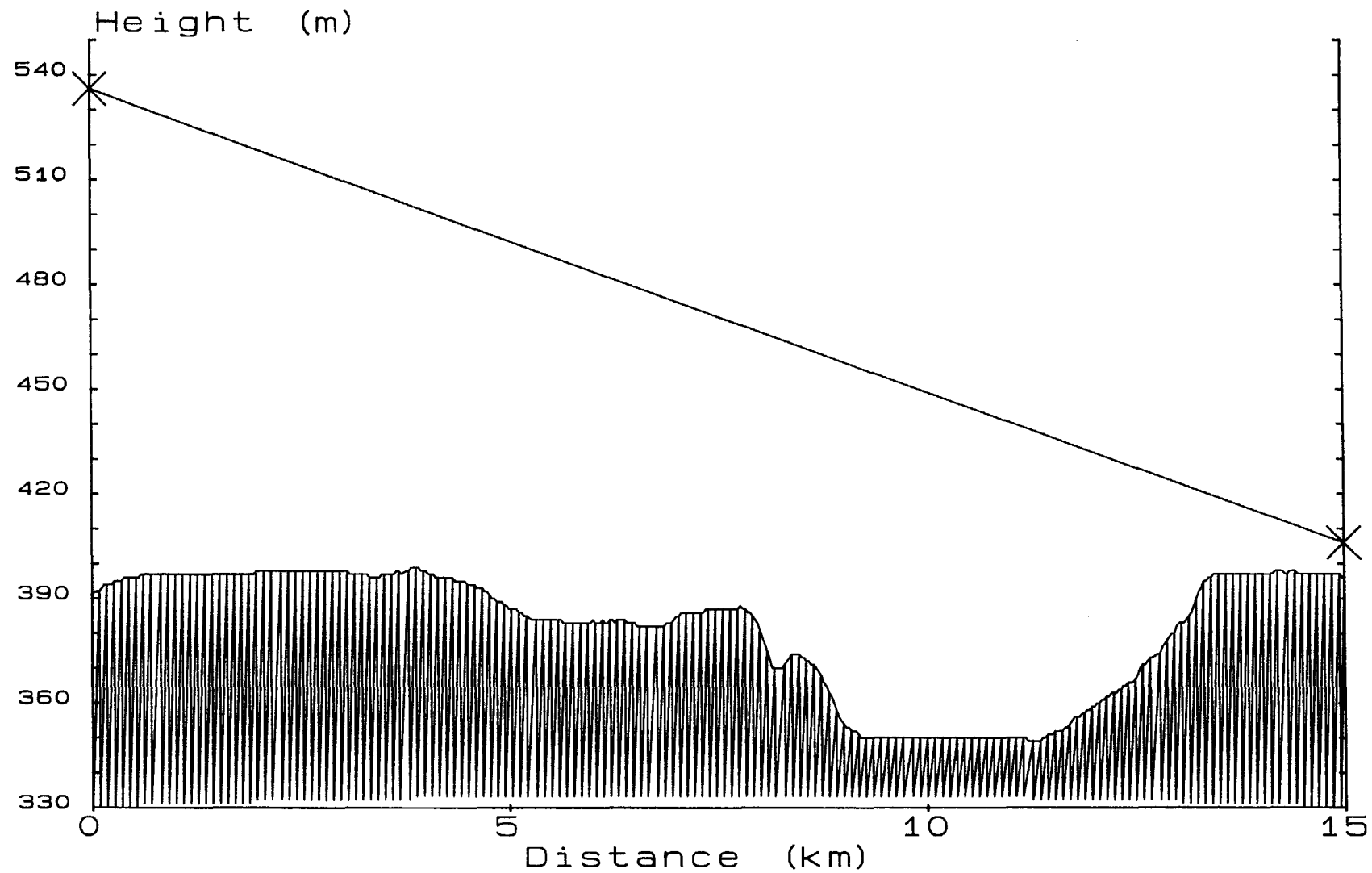
Gravel pits

Gravel pits



70 dBu

OWL ENGINEERING, INC.
ENGINEERING EXHIBIT E-3



Profile Study for Starbuck, MN

Owl Engineering, Inc.
1306 W. County Rd. F

Saint Paul, Minnesota
(612) 631-1338

Engineering Exhibit E-4